

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Article No. 7006 2760 0000 8650 5415

06 JUN 2008

Juan Somoano
Glenn Springs Holdings, Inc.
5005 LBJ Freeway
Dallas, Texas 75244

Re: Interim Corrective Measures Implementation Report
Asbestos Surface Impoundment-Solid Waste Management Unit
Occidental Chemical Corporation, 6200 S. Ridge Road, Wichita, Kansas
RCRA ID #KSD007482029.

Dear Mr. Somoano:

The Environmental Protection Agency (EPA) has reviewed the Occidental Chemical Corporation (OCC) Wichita facility report for interim corrective measures at the asbestos surface impoundment SWMU, dated April 16, 2008. EPA believes that there is additional information that must be included in this report before EPA can approve it.

General Comments

1. The Interim Corrective Measures Implementation Report (report) supersedes OCC's January 24, 2008, Asbestos Solid Waste Management Unit Closure Document. This report or its cover letter must be revised to clarify the succession.
2. Based on information provided by OCC and the Glenn Springs Holding Company during the April 2008 facility visit, the extent of the asbestos surface impoundment will be determined during the onsite RCRA facility investigation (RFI). This report or its cover letter must be revised to note the additional work planned at the asbestos surface impoundment.

Specific Comments

1. **Section 2, Page 2-1, Paragraph 1; and Figures 2-1 and 2-2.** Figures 2-1 and 2-2 show the estimated size and approximate location of the asbestos surface impoundment; however, Section 2 does not provide a basis for the estimate and approximation. The report should be revised to include historic photographs, drawings, or other documentation used to determine the estimated size and approximate location of the asbestos surface impoundment.

RCAP
GARRETT
06/05/08

RCAP
GRAVATT
06/06/08



2. **Section 2, Page 2-1, Paragraph 3; Figure 2-2; and Table 2-1.** Figure 2-2 and Table 2-1 present the respective locations and analytical results for the grab samples described in Section 2. However, because common sample identifiers are missing from Figure 2-2, Table 2-1, and Section 2, the reader cannot link the grab samples described to their respective locations and analytical results. Common sample identifiers must be provided for Figure 2-2, Table 2-1, and Section 2.
3. **Section 2, Page 2-1, Paragraph 3; and Figure 2-2.** Section 2 describes a sample collected from a stockpile of excavated material. Figure 2-2 does not show the stockpile and sample location and must be revised to include it.
4. **Section 2, Page 2-1, Paragraphs 3 and 4; and Table 2-1.** Section 2 and Table 2-1 indicate that a sample of stockpiled excavated material contained between 15 and 75 percent chrysotile asbestos. Where the excavated material was disposed is unclear, and the report must be revised to include this information.

Please submit the revised report with includes EPA's requested information within 30 days receipt of this letter. If you have any questions you may reach me at (913) 551-7159 or at Garrett.David@epa.gov.

Sincerely,

David Garrett
Environmental Scientist
RCRA Corrective Action & Permits Branch
Air & Waste Management Division

cc: Lisa Thurman
Occidental Chemicals
Devin Pollock
KDHE-BWM

AWMD/RCAP:cas:h:/DGARRETT/OCC-ASBESTOSINTERIMCMIREPORTCOMMENTS
DATED4-16-08V2.DOC/060508



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

CERTIFIED MAIL

JUN 6 2008

RETURN RECEIPT REQUESTED

Article No. 7006 2760 0000 8650 5415

Juan Somoano
Glenn Springs Holdings, Inc.
5005 LBJ Freeway
Dallas, Texas 75244

Re: Interim Corrective Measures Implementation Report
Asbestos Surface Impoundment-Solid Waste Management Unit
Occidental Chemical Corporation, 6200 S. Ridge Road, Wichita, Kansas
RCRA ID #KSD007482029.

Dear Mr. Somoano:

The Environmental Protection Agency (EPA) has reviewed the Occidental Chemical Corporation (OCC) Wichita facility report for interim corrective measures at the asbestos surface impoundment SWMU, dated April 16, 2008. EPA believes that there is additional information that must be included in this report before EPA can approve it.

General Comments

1. The Interim Corrective Measures Implementation Report (report) supersedes OCC's January 24, 2008, Asbestos Solid Waste Management Unit Closure Document. This report or its cover letter must be revised to clarify the succession.
2. Based on information provided by OCC and the Glenn Springs Holding Company during the April 2008 facility visit, the extent of the asbestos surface impoundment will be determined during the onsite RCRA facility investigation (RFI). This report or its cover letter must be revised to note the additional work planned at the asbestos surface impoundment.

Specific Comments

1. **Section 2, Page 2-1, Paragraph 1; and Figures 2-1 and 2-2.** Figures 2-1 and 2-2 show the estimated size and approximate location of the asbestos surface impoundment; however, Section 2 does not provide a basis for the estimate and approximation. The report should be revised to include historic photographs, drawings, or other documentation used to determine the estimated size and approximate location of the asbestos surface impoundment.

2. **Section 2, Page 2-1, Paragraph 3; Figure 2-2; and Table 2-1.** Figure 2-2 and Table 2-1 present the respective locations and analytical results for the grab samples described in Section 2. However, because common sample identifiers are missing from Figure 2-2, Table 2-1, and Section 2, the reader cannot link the grab samples described to their respective locations and analytical results. Common sample identifiers must be provided for Figure 2-2, Table 2-1, and Section 2.
3. **Section 2, Page 2-1, Paragraph 3; and Figure 2-2.** Section 2 describes a sample collected from a stockpile of excavated material. Figure 2-2 does not show the stockpile and sample location and must be revised to include it.
4. **Section 2, Page 2-1, Paragraphs 3 and 4; and Table 2-1.** Section 2 and Table 2-1 indicate that a sample of stockpiled excavated material contained between 15 and 75 percent chrysotile asbestos. Where the excavated material was disposed is unclear, and the report must be revised to include this information.

Please submit the revised report with includes EPA's requested information within 30 days receipt of this letter. If you have any questions you may reach me at (913) 551-7159 or at Garrett.David@epa.gov.

Sincerely,



David Garrett
Environmental Scientist
RCRA Corrective Action & Permits Branch
Air & Waste Management Division

cc: Lisa Thurman
Occidental Chemicals
Devin Pollock
KDHE-BWM

SENDER: COM

CERTIFIED MAIL

ON DELIVERY

- Complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Juan Somoano
Glenn Springs Holdings, Inc.
5005 LBJ Freeway
Dallas, TX 75244

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?
If YES, enter delivery address below:

☐ Agent

☐ Addressee

06/09/08

☐ Yes
☒ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☒ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

7006 2760 0000 8650 5415

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

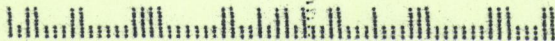
U.S. Environmental Protection Agency
Region VII
901 N 5th Street
Kansas City, Kansas 66101

RCAP-RECEIVED

JUN 11 2008

Garrett-RCAP

12307



U.S. Postal Service™

CERTIFIED MAIL™ RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

OFFICIAL USE

Postage

\$

Certified Fee

Return Receipt Fee
(Endorsement Required)

Restricted Delivery Fee
(Endorsement Required)

10 6 JUN 2008

Postmark
Here

Total Pos

Sent To

Street, Apt. 1
or PO Box N

City, State, Z

Juan Somoano
Glenn Springs Holdings, Inc.
5005 LBJ Freeway
Dallas, TX 75244

7006 2760 0000 8650 5745

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may **ONLY** be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- **NO INSURANCE COVERAGE IS PROVIDED** with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047